



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P127638 584

Mr. Cristopher Anderson
Director, Environmental Affairs
L.E. Carpenter & Company
200 Public Square
Suite 36-5000
Cleveland, OH 44114-2304

OCT 13 1998

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) has reviewed the First Quarter 1998 Quarterly Progress Report and the drainage ditch surface water sampling results. The results of the drainage ditch surface water sampling showed that there were no site related impacts, therefore this document is approved as submitted. Comments on the progress report are as follows:

1. Section 3, Quarterly Monitoring – According to the report, routine ground water monitoring activities at the site were in accordance with the revised quarterly sampling program initiated during the second quarter 1995 sampling event. The approved Quarterly Monitoring Program required L.E. Carpenter to sample MW-17 biannually, and in addition to the BTEX analytical parameters, DEHP was to be included in sampling analysis every first and third quarter of each calendar year. Since recent quarterly sampling has not included the above, all subsequent rounds of ground water monitoring must fulfill these requirements.
2. L.E. Carpenter must explain the dramatic increase in BTEX levels at MW-22 (ethylbenzene at 4,070 ppb and total xylene at 20,600 ppb). The increase in BTEX contaminants at MW-22 suggests that the recovery system may not be effectively reducing the plume at the east perimeter.
3. Future reports must include a table that depicts a compilation of quarterly monitoring data for all quarters sampled so that increasing or decreasing trends can be easily visualized.



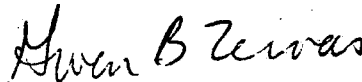
In addition, in the Department's January 20, 1998 letter comments were provided regarding Inorganic Hot Spots B and C and Hot Spot 4. Specifically, L.E. Carpenter was requested to obtain twenty soil samples from off-site locations and analyze them for lead in order to determine if the lead levels found on-site are at background concentrations. Alternatively, L.E. Carpenter could develop a revised risk assessment to determine the risk associated with leaving the lead contaminated soils on site, as well as a focused feasibility study that would address the soil capping alternative for the lead contaminated soils. Also, post excavation samples were requested on the southeast side of the Hot Spot 4 location unless the planned excavation is continued to points 4-DEL-3 and 4-DEL-7. To date, this work has not been conducted.

In the Department's July 15, 1998 letter comments were provided on the MW-19 and Hot Spot 1 Delineation Reports, which requested delineation of the ground water contamination in both areas of concern. The letter requested a schedule be provided for when this delineation work would be conducted as well as the work requested in the January 20, 1998 letter. To date, no work has been conducted and no schedule has been received.

Therefore, in accordance with Paragraph 30 of the Administrative Consent Order (ACO) dated September 26, 1986, the Department requests that a work plan be submitted within thirty (30) calendar days of the receipt of this letter for the additional work required as presented in the January 20, 1998 and July 15, 1998 letters. This work plan must contain a detailed schedule for all the work that is required. Failure to provide this work plan may result in the issuance of stipulated penalties as per Paragraph 40 of the ACO.

Please feel free to contact me at (609) 633-7261 if you have any questions.

Sincerely,



Gwen B. Zervas, P.E.
Case Manager
Bureau of Federal Case Management

C: Steven Cipot, USEPA
George Blyskun, BGWPA
John Prendergast, BEERA